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Horan, et al. v. University Hospitals Health System, Inc., et al. - 1:18-cv-02054-PAB - Discovery Dispute

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Judge Barker,

Pursuant to Local Rule 37.1, counsel for Plaintiffs respectfully request that a telephone conference be scheduled to resolve a discovery dispute in this matter. The dispute stems from interrogatories and requests for production of documents that were served on counsel for Defendants on June 11, 2019. While counsel for Plaintiffs have agreed to multiple extensions, it was made clear earlier this month that no further extensions for the responses to Plaintiffs' discovery requests would be allowed and intervention of the Court would be sought if responses were not timely received. Unfortunately, Defendants have still not provided discovery responses to Plaintiffs.

In addition, while counsel for the parties have discussed the potential for a joint motion to extend the November 15, 2019 non-expert discovery deadline, counsel for Plaintiffs have made clear that the extension would be sought solely because depositions need to be scheduled and Plaintiffs cannot ascertain who to depose until complete responses to their discovery requests are received.

Counsel for Plaintiffs certify that multiple good-faith attempts have been made to resolve this dispute since the discovery requests were issued over four and a half months ago, including at least four attempts since October 2, 2019. It is Plaintiffs' expectation that this dispute can be resolved with a telephone conference with the Court and a motion to compel won't be necessary. We appreciate the Court's attention to this issue.

Regards,



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